

Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 East 42nd Street, Suite 4510
New York, New York 10165

Telephone: (212) 317-1200
Facsimile: (212) 317-1620

cerrington@faillacelaw.com

June 14, 2021

BY ECF

Hon. John P. Cronan
United States District Judge
United States Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Romero Perez et al. v. 665 9th Ave. Restaurant Corp., 20-cv-8294*

Dear Judge Cronan:

I am an attorney with the office of Michael Faillace & Associates, attorneys for Plaintiffs in the above-referenced matter. We write jointly with Defendants pursuant to the Court's order of April 13, 2021 to advise the Court of the status of the settlement agreement.

Pursuant to the terms of the settlement in principle reached between the parties at the Court-ordered mediation, the consummation of settlement agreement is contingent on the Defendants producing certain financial documents to the Plaintiffs. Specifically, while Plaintiffs agreed to settlement in principle, the individual Plaintiffs are requiring proof of financial loss before proceeding. Unfortunately, the Defendant entity's accountant has been in the hospital for over 30 days now, and as a result, the accountant has not been able to provide the requested information and documents. The parties have thus been delayed in finalizing the agreement, and therefore the parties request a 30-day extension to provide a further update on the status of the settlement agreement.

Respectfully Submitted,

/s/ Clela Errington
Clela A. Errington, Esq.
Michael Faillace & Associates, P.C.
Attorneys for Plaintiff

Cc: All counsel via ECF

The parties shall have until July 14, 2021 to submit any settlement requiring Court approval under *Cheeks v. Freeport Pancake House*, 796 F. 3d 199 (2d Cir. 2015), and any other necessary information.

SO ORDERED.

Date: June 14, 2021
New York, New York


JOHN P. CRONAN
United States District Judge

Certified as a minority-owned business in the State of New York